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For We the People, civil rights still matter.

September 28, 2018

Via Overnight Mail and Electronic Filing

Danny Bickell
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
One First Street NE
Washington, DC 20543

Re: No. 18-122, *Sinegal v. Polk*

Dear Mr. Bickell:

I am counsel for respondent in the above-referenced case. On July 24, 2018, a certiorari petition was docketed in this case. On September 14, 2018, the Court requested a response. Unless extended by the Court, the response would be due on October 15, 2018. For the reasons that follow, and pursuant to Rule 30.4, I respectfully request an extension of 30 days, to and including November 14, 2018.

I have several pressing obligations during these upcoming weeks, including consecutive preferential trial settings in two felony criminal cases on October 26 and November 2, with final pretrial settings during the week of October 1, 2018;ⁱ and a petition for review due to be filed in the Texas Supreme Court on October 5, 2018.ⁱⁱ In addition, due to recent personnel changes in my office, I am securing assistance from qualified attorneys to insure Ms. Polk's effective response to the petition for writ of certiorari for the Court. An extension will allow me to meet these obligations and also to file a response that adequately addresses the points raised in the petition.

For these reasons, I ask that a 30-day extension be granted. Thank you for your attention to this matter.

Sincerely,

Laurence W. Watts
Counsel for Respondent

Larry Watts Melissa Azadeh Nastasha Anderson

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Cc: Kathleen Marie Kennedy, Counsel for Petitioner
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ⁱ *State v. Richard Hopes* and *State v. Christie Gallegos*, Cause Nos. 159022201010 and 1515279 in the 338th Judicial District Court of Harris County, Texas.

ⁱⁱ *Raymond Brantley v. Alief Independent School District*, No. 18-0903 in the Supreme Court of Texas. The original deadline for the petition for review was September 21, 20, however, an extension was requested due to the civil trial in an unrelated case from September 17 to 20, 2018 (*Covington v. Covington, et al.*, Civil Action No. 4:13-CV-03300 in the United States District Court for the Southern District of Texas, Houston Division).